

GORDON REES SCULLY MANSUKHANI, LLP

Ronald A. Giller, Esq.

Mallory J. Benner, Esq.

1 Battery Park Plaza, 28th Floor

New York, NY 10004

Tel: (973) 549-2500

Fax: (973) 377-1911

Email: rgiller@grsm.com

Email: mbenner@grsm.com

Attorneys for Defendants Clearview AI, Inc., Hoan

Ton-That and Richard Schwartz

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHARLES JOHNSON,

Plaintiff,

vs.

CLEARVIEW AI, INC., HOAN TON-THAT and
RICHARD SCHWARTZ,

Defendants.

Case No.: 1:23-cv-2441

**DECLARATION OF RONALD A. GILLER, ESQ. IN OPPOSITION OF
PLAINTIFF'S MOTION TO DISMISS**

I, Ronald A. Giller, hereby declare as follows:

1. I am an attorney at law of the State of New York and a partner at the law firm of Gordon Rees Scully Mansukhani LLP, counsel for Defendants Clearview AI, Inc., Hoan Ton-That and Richard Schwartz. I submit this Declaration in opposition of Plaintiff Charles Johnson's motion to dismiss.

2. Attached as **Exhibit A** is a copy of Plaintiff's Second Supplemental Responses to Interrogatories dated April 22, 2025.

3. Attached as **Exhibit B** is a copy of Plaintiff's Supplemental Responses to Requests for Admissions dated April 16, 2025.

4. Attached as **Exhibit C** is a copy of Plaintiff's Supplemental Responses to Interrogatories dated April 16, 2025.

5. Attached is **Exhibit D** is a copy of Defendants' Initial Disclosures dated July 15, 2024.

The foregoing statements are true to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I may be subject to punishment.

Dated: May 2, 2025
New York, New York

/s/ Ronald A. Giller
Ronald A. Giller